

Jason J. Henderson
Mackoff Kellogg Law Firm
38 2nd Ave E
Dickinson, ND 58601
Telephone: 701-227-1841
Facsimile: 701-225-6878
jhenderson@mackoff.com
MT Bar No. 11414
Attorney for Nationstar Mortgage LLC d/b/a Mr. Cooper

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA

In Re)	
)	Case No. 19-60025
)	
DONNA B MOHLER)	
)	
SEAN MOHLER)	
)	
Debtors.)	

STIPULATION AND AGREEMENT BETWEEN
NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER, AND DARCY M CRUM,
CHAPTER 7 BANKRUPTCY TRUSTEE RESOLVING TRUSTEE'S OBJECTION

Chapter 7 Trustee Darcy M. Crum, and Nationstar Mortgage LLC d/b/a Mr.
Cooper, by and through their attorneys, hereby stipulate and agree as follows:

1. The Debtors filed this case under Chapter 7 on January 8, 2019.
2. Nationstar Mortgage LLC d/b/a Mr. Cooper has filed a Motion to Modify Stay on February 22, 2019. Debtors have indicated on Official Form 108 Statement of Intention for Individuals Filing Under Chapter 7, that they intend to surrender the property and have not filed any responsive pleading to Nationstar Mortgage LLC d/b/a Mr. Cooper Motion to Modify Stay.

3. Debtors are in default on their loan with Nationstar Mortgage LLC d/b/a Mr. Cooper in the amount of \$9,364.77 as of February 18, 2019.

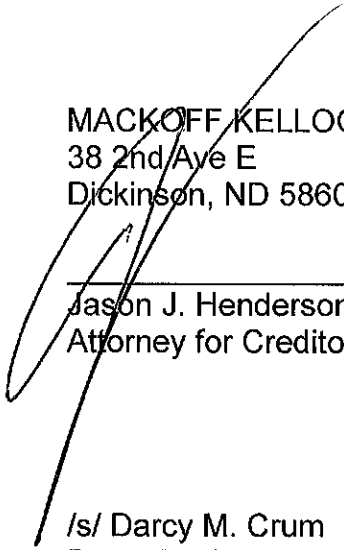
4. Nationstar Mortgage LLC d/b/a Mr. Cooper has conferred with Chapter 7 Trustee Darcy M Crum, and has agreed to allow 120 days (July 5, 2019) for the Chapter 7 Trustee to get a short sale approved by Nationstar Mortgage LLC d/b/a Mr. Cooper and complete a sale of the property.

5. In the event the Trustee is unable to get a short sale approved by Nationstar Mortgage LLC d/b/a Mr. Cooper and complete a sale of the property within 120 days (July 5, 2019), Nationstar Mortgage LLC d/b/a Mr. Cooper shall be entitled to proceed immediately exercise its remedies in seeking foreclosure and liquidation of the collateral described in the Motion filed by Nationstar Mortgage LLC d/b/a Mr. Cooper without further notice or Motion to Modify Stay or Order Modifying Stay from the Bankruptcy Court. In the event the property is not sold in 120 days (July 5, 2019) under this Stipulation and Agreement, Nationstar Mortgage LLC d/b/a Mr. Cooper shall not be further required to obtain additional relief from the bankruptcy automatic stay and may proceed directly to exercise its remedies available under this agreement and under state law.

WHEREFORE, the parties agree as set forth above and request approval of this Stipulation and Order from the Bankruptcy Court pursuant to its terms.

DATED 22nd day of March, 2019.

MACKOFF KELLOGG LAW FIRM
38 2nd Ave E
Dickinson, ND 58601



Jason J. Henderson
Attorney for Creditor

DATED 22nd day of March, 2019.

/s/ Darcy M. Crum
Darcy M. Crum
Chapter 7 Bankruptcy Trustee and Attorney for
the Estate
ECF Email

CERTIFICATE OF MAILING

I, the undersigned, Jason J. Henderson do hereby certify, under penalty of perjury that a copy of the within and foregoing STIPULATION AND AGREEMENT was sent by first class mail postage prepaid on the March 22, 2019, Dickinson, North Dakota, and directed to the following:

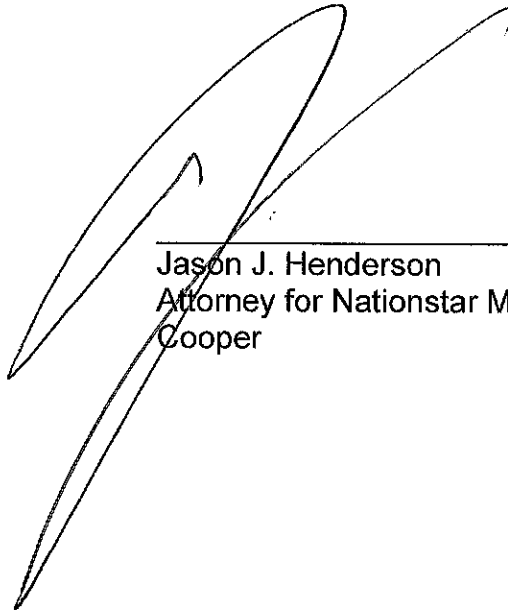
THE UNITED STATES TRUSTEE
ECF EMAIL

STEVEN M JOHNSON
BANKRUPTCY ATTORNEY
ECF EMAIL

DARCY M. CRUM
BANKRUPTCY TRUSTEE
ECF EMAIL

DONNA B MOHLER
3305 14TH ST NE
GREAT FALLS, MT 59404

SEAN MOHLER
3305 14TH ST NE
GREAT FALLS, MT 59404



Jason J. Henderson
Attorney for Nationstar Mortgage LLC d/b/a Mr.
Cooper